

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § **Chapter 11 (Subchapter V)**
FREE SPEECH SYSTEMS LLC, § **Case No. 20-60043 (CML)**
 Debtor. §

**SUPPLEMENTAL DISCLOSURES TO VERIFIED STATEMENT OF
SUBCHAPTER V TRUSTEE**
[Relates to #22]

Melissa A. Haselden, duly appointed Subchapter V Trustee (“Trustee”) in the captioned case, hereby files these supplemental disclosures to the Verified Statement of Subchapter V Trustee filed at Docket #22 as follows:

1. “Debtor seeks to employ J. Patrick Magill (“Mr. Magill”) as CRO in the captioned case. I am currently the Subchapter V Trustee in the unrelated Subchapter V, Chapter 11 case filed by Cypress Creek Emergency Medical Services Association (“CCEMS”) under Case No. 21-33733, pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Mr. Magill has served as the CRO in the CCEMS bankruptcy case.
2. Also, in the past, at my prior firms of Weycer, Kaplan, Pulaski & Zuber, P.C. and HooverSlovacek, LLP, I worked with Mr. Magill on various, unrelated cases where my firm acted as Debtor’s counsel and Mr. Magill acted as CRO to the Debtor, including the following bankruptcy cases:
 - *In re Goldstar Emergency Medical Services, Inc. and Goldstar EMS II, Inc.*, Jointly Administered Under Case No. 05-36446 in the Southern District of Texas, Houston, Texas.

- *In re Diagnostic Clinic of Houston, P.A.*, Case No. 07-30396 in the Southern District of Texas.
- *In re Apex Katy Pin Oak Medical*, Case No. 12-31848 in the Southern District of Texas
- *In re Victory Medical Center Mid-Cities, LP et al*, Jointly Administered Under Case No. 15-42373 in the Northern District of Texas, Fort Worth Division.
- *In re The Tifaro Group Ltd et al*, Jointly Administered Under Case No. 17-80171 in the Southern District of Texas.

3. I have also worked with Mr. Magill on other unrelated matters as have other attorneys at my prior firms.
4. In 2013-2014, at my prior firm, I also worked on Chapter 11 Case No 13-32101 filed by Mud King Products, Inc. (“Mud King”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. My firm represented the Debtor in the Mud King bankruptcy case. During the pendency of the Mud King bankruptcy case, Andino Reynal represented the principal of Mud King in its bankruptcy case.
5. In connection with my expanded duties as Subchapter V Trustee, I plan to seek engagement of counsel to assist me with legal matters in this case. I plan to retain the firm Jackson Walker LLP as my counsel, with Elizabeth C. Freeman of Jackson as the lead attorney. In the past, I have worked on various unrelated cases in which my firm represented debtors in bankruptcy and attorneys from Jackson Walker have represented creditors. Also, in the past, attorneys at Jackson Walker have occasionally referred potential cases to me.
6. In the past, I also may have worked with some of the parties and creditors who have appeared in captioned case on unrelated cases or matters.
7. None of these connections creates a materially adverse interest to or conflict with the Debtor or its estate.

8. Further, due to the unusual nature of the captioned case and the expanded role of the Subchapter V Trustee, Elyse Farrow, an attorney and member of my firm, Haselden Farrow, PLLC, will assist me in carrying out my required duties. Ms. Farrow's time will be billed as paraprofessional time at an hourly billing rate of \$150.00, which is the firm's standard rate for billing paraprofessional time."

Dated: October 5, 2022

HASELDEN FARROW PLLC

By: /s/ Melissa A. Haselden

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